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CITY AND COUNTY OF SAN FRANCISCO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION**

THADDEUS SALEEM SHAHEED,

Plaintiff,

v.

CITY AND COUNTY OF SAN FRANCISCO,
et al.,

Defendants.

Lead Case No. 22-cv-01587-JSW

Case No. 4:22-cv-06013-JSW

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO EXCHANGE INITIAL
DISCOVERY PURSUANT TO GENERAL
ORDER NO. 71**

Date Action Filed: October 12, 2022

Trial Date: Not Set

Pursuant to Northern District of California Civil Local Rules 7-12, and 16-3(e), PLAINTIFF
THADDEUS SALEEM SHAHEED (“Plaintiff”) and DEFENDANT CITY AND COUNTY OF SAN
FRANCISCO (“Defendant”) through their counsel of record, HEREBY AGREE AND STIPULATE AS

1 FOLLOWS:

2 1. WHEREAS, on October 12, 2022, Plaintiff Thaddeus Saleem Shaheed Jose Guardado,
3 filed a civil complaint with this Court against Defendant City and County of San Francisco (Defendant).
4 (Dkt. No. 1);

5 2. WHEREAS, on November 15, 2022, the case was reassigned to the Honorable Jeffrey S.
6 White. See Dkt. No. 12;

7 3. WHEREAS, on March 13, 2023, the case was ordered consolidated with *Guardado et al.*
8 *v. Defendant*, 4:22-CV-0431-JSW. See Dkt. No. 39, *Guardado*, 4:22-CV-0431-JSW;

9 4. WHEREAS, on March 14 and March 15, 2023, attorneys at Seyfarth Shaw, LLP filed
10 notices of appearance with the Court to serve as lead counsel for Defendant. See Dkt. Nos. 24-27;

11 5. WHEREAS, on May 1, 2023, the Court entered an Amended Minute Entry setting
12 various case deadlines following the April 28, 2023 Case Management Conference. See Dkt. No. 55,
13 *Guardado*, 4:22-CV-0431-JSW. Pursuant to the Court's Amended Minute Entry, for all parties in the
14 related actions, initial discovery obligations under General Order 71 are due 90 days from the date of the
15 initial Case Management Conference, or July 27, 2023.

16 6. WHEREAS, counsel for Defendant has diligently reviewed the pleadings, claims, and
17 information in this action but has required additional time to prepare responses pursuant to General
18 Order 71 discovery;

19 7. WHEREAS, on July 5, 2023, counsel for Defendant informed Plaintiff that counsel will
20 be seeking to withdraw from this Action, and Defendant will seek substitute counsel;

21 8. WHEREAS, the Parties have agreed and respectfully submit that an extension of time for
22 Defendant to provide initial discovery pursuant to General Order 71 is necessary for the transition of
23 Defendant's defense.

24 THEREFORE, IT IS HEREBY STIPULATED AS FOLLOWS:

25 1. The Parties have agreed and respectfully submit that the anticipated withdrawal of
26 counsel for Defendant and its anticipated substitution of new counsel and need for additional time to
27 respond necessitate an extension for the Parties' to exchange initial discovery pursuant to General Order
28

71.

2. The Parties shall exchange initial discovery pursuant to General Order 71 by September 6, 2023.

IT IS SO STIPULATED.

DATED: July 25, 2023

PACIFIC JUSTICE INSTITUTE

By: /s/ Kevin T. Snider

Kevin T. Snider
Counsel of Record

Attorneys for Plaintiff,
THADDEUS SALEEM SHAHEED

DATED: July 25, 2023

SEYFARTH SHAW LLP

By: /s/ Yoon-Woo Nam

Coby M. Turner
Eric M. Lloyd
Dawn R. Solowey (*pro hac vice*)
Yoon-Woo Nam

Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

ATTESTATION OF E-FILED SIGNATURE

I, Yoon-Woo Nam, am the ECF User whose ID and password are being used to file this Stipulation and Proposed Order Extending Time to Exchange of Initial Discovery Pursuant to General Order 71. In compliance with Local Rule 5-1(i)(3), I attest that Kevin T. Snider has read and approved this pleading and consented to its filing in this action.

DATED: July 25, 2023

SEYFARTH SHAW LLP

By: /s/ Yoon-Woo Nam
Yoon-Woo Nam

**ORDER GRANTING EXTENSION OF TIME TO EXCHANGE OF INITIAL DISCOVERY
PURSUANT TO GENERAL ORDER 71**

The Court finds the anticipated withdrawal of counsel for Defendant and its anticipated substitution of new counsel and need for additional time to respond necessitate an extension for the Parties' to exchange initial discovery pursuant to General Order 71. The Parties shall exchange initial discovery pursuant to General Order 71 by September 6, 2023.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

Hon. Jeffrey S. White
UNITED STATES DISTRICT JUDGE